

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, MARYLAND**ELISE GREENE
3015 BEECH ST NW
WASHINGTON DC, 20015****Plaintiff,****v.****ALBERTSONS/SAFEWAY, INC.****Serve Registered Agent for:
SAFEWAY INC.
The Corporation Trust, Incorporated,
2405 York Road, Suite 201
Lutherville Timonium, MD 21093****Defendant.****Civil Case No. C-15 CV-22-001639****COMPLAINT****COMES NOW the Plaintiff, Elise Greene, who complains and alleges as follows:**

- 1. Plaintiff is a resident of the District of Columbia, residing at 3015 Beech St. NW, Washington, DC 20015.**
- 2. The Defendant, Safeway, Inc. is an active Delaware Stock Corporation authorized to conduct business in Maryland.**
- 3. On May 19, 2019, Plaintiff slipped on a puddle of still water on Defendant's property as she was attempting to exit the restroom of the Safeway located at 10541 Connecticut Ave, Kensington, Maryland 20895.**
- 4. Based on the conditions of the restrooms, the Defendant knew or should have known about the hazardous conditions on store property.**
- 5. Defendant did not display a wet floor sign indicating the hazardous conditions.**

6. Defendant's paper towel holders and toilet paper holders were broken, preventing patrons from drying their hands.

7. Defendants' failure to remove this hazardous condition is the proximate cause of Plaintiff's injuries.

8. The personal injuries suffered by the Plaintiff include bodily injuries, physical pain, suffering, inconvenience, mental anguish, humiliation, and embarrassment, as well as surgical medical bills and missing time from work.

9. Plaintiff demands a jury trial on all issues proper for a jury to hear.

10. Compensation sought by Plaintiff exceeds \$100,000.00.

WHEREFORE, for these reasons, Plaintiff prays for judgment, against Defendant, in amount of \$750,000.00, and for his costs expended.

Respectfully submitted,

ELISE GREENE
By Counsel



James R. Tate, Esq. # 730 2070001
Counsel for Plaintiff

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